

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Benito Rojas,	:	Bankruptcy Case No. 24-22690-JAD
	:	
Debtor.	:	Chapter 13
	:	
<hr style="width: 40%; margin-left: 0;"/> Benito Rojas,	:	
	:	Document No.: 44
Movant,	:	
	:	Related to Document No.:
v.	:	
	:	Related to Claim No.: 5
Citizens Bank, N.A. sbm to Citizens	:	
Bank of PA,	:	
	:	
Respondent.	:	

**DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING**

Pursuant with the Notice of Mortgage Payment Change filed on January 16, 2025, after reasonable investigation and upon review of the proposed Chapter 13 Plan, it appears to Debtor that the that the payment is sufficient to fund the proposed Chapter 13 Plan even with the proposed change for February 7, 2025.

The new post-petition monthly payment payable to Respondent is \$330.37, effective February 7, 2025, per the notice dated January 16, 2025. The Debtor's proposed Plan payment provides for a monthly payment to Citizens Bank, N.A. sbm to Citizens Bank of PA of \$341.32. Therefore, Debtor's proposed Plan remains sufficient.

Respectfully Submitted,

Date: January 22, 2025

/s/Brian C. Thompson  
Brian C. Thompson, Esquire  
Attorney for Debtor  
PA I.D. # 91197  
Thompson Law Group, P.C.  
301 Smith Drive, Suite 6  
Cranberry Township, PA 16066  
(724) 799-8404 Telephone  
(724) 799-8409 Facsimile  
[bthompson@thompsonattorney.com](mailto:bthompson@thompsonattorney.com)